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Paris

- \* New Jersey
- ∞ Patent Bar
- ° Victoria (Australia)

∇ Israel

November 15, 2017

Wo Hop Restaurant, Inc. 17 Mott Street New York, New York, 10013

Re: Unauthorized Uses of Alla Prima Pictorial/Graphic

Works: CEASE AND DESIST

## To Whom It May Concern:

We represent Shirley Shepard and Andrea Shepard (the "Shepards"). The Shepards are owners of Alla Prima, a company that specializes in the creation and delivery of designs printed on fabric and fashionable items to wholesale businesses. Over the past 20 years Alla Prima has sold shirts, sports clothes, and bags imprinted with customized designs created by the Shepards. The Shepards are also artists known for their business of creating sketch artwork of courtroom scenes in real-time where cameras are prohibited, including sketches of Martha Stewart, Sean Combs, Woody Allen, Jay-Z, Rudy Giuliani, Leona Helmsley, Liza Minnelli, Yoko Ono, Mike Tyson and Rosie O'Donnell, among many others.

Recently, the Shepards have become aware through the exercise of reasonable diligence that Wo Hop has again been illegally reproducing and distributing T-shirts with their Dragon Design, without Alla Prima's copyright. The Dragon Design as it appears on Wo Hop T-shirts offered for sale by certain third party sellers on Ebay's website and are attached to this letter. It is clear that these third party sellers purchased these T-shirts from Wo-Hop.

In or around 1993, the Shepards had met with a representative of Wo Hop, Frankie, and showed him samples of T-shirt designs, including sketches of dragons. Frankie chose the dragon in the circle. Wo Hop began selling dragon shirts on the display case with the exact dragon, but without the Alla Prima copyright. Wo Hop was notified that it illegally produced the same Dragon Design on T-shirts without Alla Prima's copyright. Moreover, Wo Hop is well aware that it was illegal then as it is now to reproduce and distribute Alla Prima's Dragon Design.

Wo Hop's unauthorized use of the Dragon Design and sale to third parties constitutes an

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illegal use of Alla Prima's copyright. The Dragon Design was hand designed and drawn by the Shepards, and did not exist prior to Alla Prima's creation. As such, Wo Hop must immediately cease use of printing the Dragon Design on T-shirts or any of its other merchandise.

Accordingly, at this time, we demand that Wo Hop:

- a) Immediately and permanently cease and desist from all use of any of the Shepards' designs printed on T-shirts;
- b) Provide evidence demonstrating that Wo Hop has: (i) abandoned its use of the dragon design print; and (ii) destroyed all shirts it possesses;
- c) Provide us with details accounting for each distribution of the T-shirts therein to each third party.

Please provide the items demanded above in paragraphs (b) and (c) no later than November 20, 2017.

Your response will guide how the Shepards wish to resolve this matter.

We do hope that you understand the seriousness of this matter and that we can look forward to your complete cooperation in immediately resolving this to the Shepards' satisfaction.

If you have any questions, please feel free to contact me.

Very truly yours,

Kevin Murphy